

REMARKS:

1) The rejection of claim 1 under 35 USC §112, second paragraph is respectfully traversed as not applicable to amended claim 3 and the claims 4 to 9 remaining dependent under claim 3. The additional steps proposed in the Office Action in section 2 on page 2 are now included in new main claim 3. Step e) covers the "clamping", step f) covers the "introducing", and step h) covers the "separating". All claims 3 to 9 have been drafted in the form customary for US patent claims. Withdrawal of the rejection under 35 USC §112, second paragraph is respectfully requested.

2) The new claims 3 to 9 are supported by the original disclosure as follows.

Claim 3 is supported by claim 1 and the specification, page 2, lines 14 to 24 and particularly page 8, line 24; and page 10, lines 14 to 18.

The cutting step of claim 4 is supported in the specification, page 10, line 24.

The step of holding down the substrate as defined in claim 5 is supported in the specification, page 9, lines 19 to 27.

Clamping down on the chips in a resilient manner as set forth in claim 6 is supported in the specification page 6, lines 19 to 24, page 7, lines 1 to 25, and page 9, line 3 to page 10, line 2.

The in-plane stretching of the mold release film as set forth in claim 7 is supported in the specification page 5, lines 10 and 11.

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New claim 8 is fully supported by the disclosure of original Fig. 1.

New claim 9 is supported by original claim 2 and the drawings.

Thus, the new claims 3 to 9 do not contain any new matter. Entry of the new claims is respectfully requested.

- 3) The rejection of claims 1 and 2 as being anticipated under 35 USC §102(e) by US Patent Publication 2002/0017738 (Miyajima) is respectfully traversed for the following reasons. A reference to be anticipatory must show all the steps or features of a claim within the disclosure of a single reference. The apparatus of Miyajima is capable to form one chip at a time. Only one semiconductor chip (6) is included in one cavity (7) of an upper mold block 5, please see in this connection also Figs. 2A or 9A of the Miyajima disclosure. The plurality of steps now recited in new claim 3 cannot be performed by the apparatus of Miyajima. Therefore, this reference cannot anticipate the claims as now more clearly defined.
- 4) According to the invention it is possible to produce any number of individual chips, all of which are produced simultaneously and are subsequently separated from one another by a cutting step. Moreover, the present invention is capable of accommodating the plurality of semiconductor chips simultaneously while also accommodating different geometries of the individual chips, such as their surface configuration, their surface inclination, and even different heights of the individual chips, please see the

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present specification page 6, line 23 and page 9, last paragraph. Even though the invention accommodates chips of different heights simultaneously, the pressure is still equal on each chip due to the resiliency of the individual pressure application elements, please see Fig. 1 of the present disclosure.

5) Withdrawal of the rejection under 35 USC §102(e) in view of US Patent Publication 2002/0017738 A1 is respectfully requested.

6) With regard to section 5 on page 4 of the Office Action, applicants have assumed US Patent 6,770,236 B2 (Miyajima) has been cited as "pertinent" but not as a reference that "reads on claims 1 and 2". A reference that in fact "reads on" a claim is an anticipatory reference. Clarification is respectfully requested. US Patent 6,770,236 B2 is concerned with evacuating the mold cavity prior to introducing the resin. Further, the release film (50) in the apparatus of US Patent 6,770,236 B2 is lifted off the top of the chips by the resin (44a) pressed into the mold cavity, please see for example the sequence of resin flow in Figs. 6 to 9 of this reference. As a result, the chips are completely embedded in the resin on all sides, except the side attached to the substrate. Several chips are fully embedded in resin simultaneously and each chip's upper surface is covered with resin. Contrary thereto, the present chips "have an upper surface free of resin flash". Please see the present specification page 10, line 28. Therefore, US Patent 6,770,236 B2 does not "read on" the present claims, neither the original

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claims 1 and 2 nor new claims 3 to 9. Withdrawal of all rejections is respectfully requested.

- 7) Favorable reconsideration and allowance of the application, including all present claims 3 to 9, are respectfully requested.

Respectfully submitted,

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